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Scott Walker
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Dear Mr. Walker,

I am responding to your memo dated May 30, 2001 regarding our 12 day pre-general report.

You ask us to clarify a \$7,500 payment to our connected organization from our political action committee for renting lists for the 2000 elections. You point out that federal election law prohibits a corporation from contributing or expending funds for the purpose of influencing election.

Our connected organization has never expended funds in violation of federal election law. The \$7,500 payment was made by our political action committee to our connected organization in order to legally rent the connected organization's mailing list. Our connected organization may not give the mailing list to our political organization because that would amount to our connected organization making an illegal contribution to the political action committee. Therefore, the political action committee rents the list from the connected organization list at fair market value.

This transaction is legal and is the way the two organizations have handled the rental of lists for the past 15 years.

As you requested, revised Schedule D is attached. The revisions were made in red. I hope this is acceptable.

Sincerely,

Richard Fox
Treasurer

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